

**UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

NANCY R., pseudonymously,

Plaintiff,

vs.

Case No. 25-cv-00462-G

PLAZA HOTELS, LLC;  
STEVE KETTER;  
MICHAEL WILEY;  
OKC AIRPORT ES, LLC;  
ESH STRATEGIES FRANCHISE, LLC;  
KAJAL HOSPITALITY, LLC;  
JALIYAN HOSPITALITY, INC.  
SUPER 8 WORLDWIDE, INC.;  
RAJ KRUPA HOTEL, LLC;  
DAYS INNS WORLDWIDE, INC.;  
CHAND & SAAJ HOSPITALITY, INC.;  
RAMADA WORLDWIDE, INC.;  
YASH ENTERPRISES, INC.;  
HOWARD JOHNSON  
INTERNATIONAL, INC.;  
NOOR HOTEL, LLC;  
AMBICA, LLC;  
OM, LLC;  
INDRA, LLC; and  
G6 HOSPITALITY FRANCHISING,  
LLC,

Defendants.

**DEFENDANT JALIYAN HOSPITALITY, INC.'S**  
**NOTICE OF NON-OPPOSITION TO PLAINTIFF'S REQUEST FOR LEAVE TO**  
**AMEND COMPLAINT**

Defendant Jaliyan Hospitality, Inc. ("Defendant" or "Jaliyan") by and through its counsel of record, COFFEY, SENGER, HANCOCK & HARMON, PLLC, hereby provides its notice to the Court that Jaliyan does not oppose Plaintiff's request for leave to amend her Complaint, as proposed by Plaintiff in Doc. 58. This notice is not intended to waive any defense and Jaliyan

expressly reserves the right to raise any and all defenses available, including any motion to dismiss or dispositive, jurisdictional or procedural motion to the amended complaint, as applicable, once the amended complaint is filed.

Respectfully Submitted,

/s/ David C. Senger  
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Hunter M. Siex, OBA No. 33217  
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*Attorneys for Jaliyan Hospitality, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this, the 13<sup>th</sup> day of June 2025, the foregoing was submitted to the Clerk of Court using the Court's ECF System for filing and for transmittal of a Notice of Electronic Filing to all counsel of record in this case.

/s/ David C. Senger